

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION)
CORPORATION,)

Plaintiff-Applicant,)

v.)

BERNARD L. MADOFF INVESTMENT)
SECURITIES LLC,)

Defendant.)

In re:)

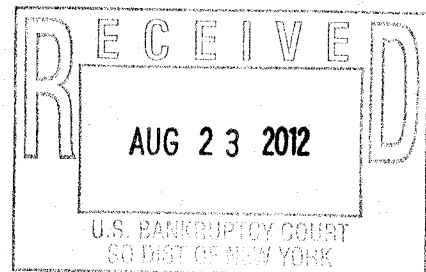
BERNARD L. MADOFF,)

Debtor.)

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)



**NOTICE OF MOTION TO REMOVE IRVING H. PICARD AS TRUSTEE FOR THE
SUBSTANTIVELY CONSOLIDATED SIPA LIQUIDATION OF BERNARD L. MADOFF
INVESTMENT SECURITIES LLC AND BERNARD L. MADOFF**

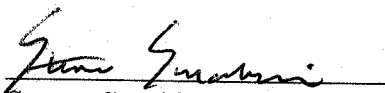
We, Steven Surabian and Richard Surabian having accounts opened directly through Bernard L. Madoff with Bernard L. Madoff Investments Securities LLC ("BLMIS") and as claimants and customers having interest, Motion this Court for the Removal of Irving H. Picard as Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004. Hearing date if required to be determined by the Court.

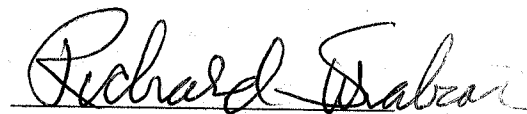
PLEASE TAKE FURTHER NOTICE that written objections to the motion must be filed

with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **4:00 p.m. on September 3, 2012** (with a courtesy copy delivered to the chambers of the Honorable Burton R. Lifland) and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, attn: David J. Sheehan, and (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, DC 20005, attn: Kevin H. Bell, Esq. (c) Steven Surabian, 1230 Rt. 28, South Yarmouth, MA 02664 and (d) Richard Surabian, P.O. Box 397, West Hyannisport, MA 02672. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific bases of any objection to the Motion.

PLEASE TAKE FURTHER that replies to objections, if any, must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **4:00 p.m. on September 13, 2012** (with a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland).

Dated: August 21, 2012


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